

Exhibit 2

DECLARATION OF YODELAINE DORCIN

I, Youdelaine Dorcin, declare:

1. I have personal knowledge of the facts set forth in this declaration. If called to testify as a witness, I could do so and would testify to these facts.

2. I am a Haitian beneficiary of Temporary Protected Status (TPS). My current TPS will expire on August 3, 2025 as a result of the government's "Partial Vacatur" of TPS for Haiti. I have had TPS since 2010. My current work permit was set to expire in February 2026, but now it will expire in August of this year.

Background

3. I have been physically present in the United States since September 2006.

4. I rent a home and live in Brooklyn, NY.

5. Currently, I am a full-time bookkeeper at Catholic Charities of Brooklyn and Queens. My authorization to work comes from my TPS. My goal one day is to open my own restaurant. To achieve this, I'm trying to create my own food business. I've been actively working towards this goal for over 10 years.

6. I have a degree in culinary arts from Kings Borough Community College. I attended school there for two years and received my degree in 2015. I was not eligible for any financial aid for school due to my legal status, so I paid for tuition out of pocket by working full time at a Burger King (including a few months where I also worked part time at a second Burger King location). I've worked hard my whole life.

7. While I was still in college I started working for Marta, a restaurant that belongs to the Union Square Hospitality Group, as a "garde manager." As a garde manager, I worked as a chef, specializing in cold food preparation and storage. I did that for two years.

8. After that, I worked two jobs simultaneously: I worked for Standard Hotel in Manhattan as a line cook in their restaurant, and I worked part-time as a caterer for a catering company in Brooklyn called Fleurimond Catering.

9. When I left the Standard Hotel, I worked for a company called Guckenheimer Events and Catering. I ultimately left this job due to health concerns.

10. When I left Guckenheimer, I returned back to Union Square Hospitality Group and worked as a reservationist for over a year. My job was not only booking tables for clients, but to anticipate the needs of the person calling. For example, if someone made a reservation to celebrate an anniversary, my job was to sense that they'll need a quiet place, champagne, flowers on the table, etc.

11. After Union Square, and in 2021, I started working for Catholic Charities. At first, I worked part time as a resource assistant. Later, I was promoted to "intake and referral specialist." After a third promotion, I became a bookkeeper. Around this time, I graduated from Brooklyn College with a bachelor's degree in community health. I am currently planning to go back to Brooklyn College this September to get my master's degree in public health. Another life goal of mine is to work for the Center for Disease Control in public health.

12. Now, I am the bookkeeper for the Community Outreach Center department. My department has seven staff members. I also translate for them and assist with intakes. I volunteer to help on their Christmas and Thanksgiving "give away" events of turkeys and things like that. This is a full-time job.

13. However, losing TPS early will result in losing my job.

14. I have four other people who currently financially depend on me: my sister and her three daughters who all live in Haiti. My sister depends on me to send her money so that her kids can go to school and get necessary medications.

Impact if TPS for Haiti Ends

15. If TPS is terminated, I will suffer immense harm.

16. I have immense anxiety as a result of the shortening of the TPS designation period.

17. I have fears about speaking Creole in public, that people might assume that I'm an illegal migrant, and that I might get arrested as a result.

18. If I lose my work authorization, I will lose my job and won't be able to pay rent. I also won't be able to send money back to Haiti for my sister or her children. Because my sister isn't able to find employment, I don't know how she or her children would be able to afford food and basic needs.

19. If I have to return to Haiti, I don't know how I would find enough food to eat.

20. If I have to return to Haiti, I doubt I would be able to find a job. Haiti is in a catastrophic condition in every way: unemployment is enormous, the gangs have taken over, there is no rule of law or security, people have been forced out of their homes because of the gangs, the health care system is very broken down, and many people are actually starving. Jobs aren't available. I would not be able to afford to live.

21. If I have to return to Haiti, I will not have stable housing. Given the conditions of extreme poverty, gang violence, homelessness, and lack of rule of law in Haiti, I don't know how I would find any stable housing. I don't own any property there, and there isn't much available housing anyways.

22. If I have to return to Haiti, I will not have access to adequate medical care. I currently take Pravastatin to treat my high blood pressure, along with a cocktail of other medications to treat my serious health conditions. But it's extremely unlikely that I'd be able to find these medication or any equivalent medication in Haiti. The Haitian medical care system has broken down: many doctors have fled, many hospitals are closed, etc. Both my mother and sister died due to the broken-down medical system in Haiti. The system continues deteriorating due to various factors, such as the everlasting effects of the 2010 earthquake and the ongoing gang violence.

23. I am afraid that, if deported back to Haiti, I will be kidnapped. I will be a target in Haiti because I will be perceived as someone with money after having lived and worked in the United States for nineteen years. People would think that I could pay a ransom, or that I know people in the United States with money who could pay a ransom. I could not go to the police in Haiti with these concerns; Haiti does not have an effective or powerful police force. Some of the police officers are corrupt and connected to the gangs themselves.

24. Additionally, as a young woman, I am afraid of getting raped or otherwise abused by the gangs in Haiti, if not killed.

I declare that to the best of my current knowledge that the foregoing is true and correct. Executed on this 12th day of March, 2025.



YOUDELAINE DORCIN